

provided that adequate mitigative measures, including appropriate monitoring plans, have been incorporated into the project's final plans and specifications. We welcome the opportunity to review any conceptual wetland mitigation plans.

Endangered Species Act Comments

Our records do not indicate the presence of any species federally listed as endangered or threatened, or species proposed for listing, in the project area. Therefore, you are not required to take actions to protect federally listed species at this time. However, if the project is modified, or new information about the project becomes available that suggests species that are listed or proposed for listing may be present and/or affected, you should initiate consultation with us as required by Section 7 of the Act.

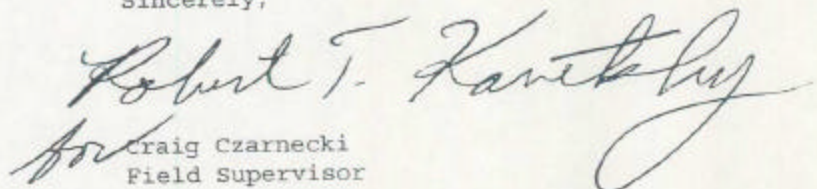
We further advise that should any species occurring in the project area become federally listed or proposed for listing before completion of this project, the Federal action agency for the work would also be required to reevaluate its responsibilities under the Act. Since threatened and endangered species data is continually updated, new information pertaining to this project may become available which may modify these recommendations. Therefore, we recommend the lead Federal agency annually request an updated Federal list of the species occurring in the project area.

Summary

The proposed action would likely impact wetland habitat. We recommend you include in forthcoming NEPA documents a detailed conceptual comprehensive wetland habitat mitigation plan that meaningfully addresses the avoidance, minimization, and replacement of wetland habitat functions and values lost to the proposed action.

We appreciate the opportunity to provide these comments and look forward to continued coordination with your agency. If you have any questions, please contact Mark Hodgkins at (517) 351-6289, or the above address.

Sincerely,

  
for Craig Czarnecki  
Field Supervisor

cc: Michigan Department of Transportation, Environmental Section,  
Lansing, MI (Attn: Ron Kinney)  
Federal Highway Administration, Lansing, MI  
(Attn: James Kirschensteiner)  
Michigan Department of Environmental Quality, Land & Water Management  
Division, Lansing, MI (Attn: Jerry Fulcher)  
U.S. Environmental Protection Agency (B-19J), Chicago, IL  
(Attn: Sherry Kamke)





MICHIGAN DEPARTMENT OF STATE  
Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

STATE HISTORIC PRESERVATION OFFICE  
Michigan Historical Center  
717 West Allegan Street  
Lansing, Michigan 48918-1800

October 30, 2000

MARGARET BARONDESS  
MICHIGAN DEPARTMENT OF TRANSPORTATION  
425 WEST OTTAWA  
PO BOX 30050  
LANSING, MI 48909

RE: ER-01-19 Environmental Assessment and Scoping Document for the M-15 Improvement  
Project, I-75 to I-69, Oakland and Genesee Counties (FHWA)

Dear Ms. Barondess:

We have reviewed the Environmental Assessment and Scoping Document for the M-15 Improvement Project. This project is located in a part of Michigan that is rich in historic resources for which we currently have very incomplete data. The current right-of-way of M-15 and any new alignments will require survey of above-ground cultural resources. We recommend that the following area be used as the basis for historical context development: for Genesee County, Davison Township south of I-69 and all of Atlas Township, and for Oakland County, the east half of Groveland Township, west half of Brandon Township, northeast quarter of Springfield Township, and northwest quarter of Independence Township.

In addition, the State Archaeologist, Dr. John Halsey, notes that archaeological resources may be affected at the project site; therefore, an archaeological survey should be conducted and submitted to this office so that we may complete our review, prior to any site clearance or construction activity. Enclosed, for your convenience, are lists of historians and archaeologists who meet professional requirements, and an information sheet on archaeological surveys.

If you have any questions, please contact Martha MacFarlane-Faes, Environmental Review Coordinator, at (517) 335-2721. **Please reference our project number in all communication with our office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Brian D. Conway  
State Historic Preservation Officer

BDC:JRH:ROC:bgg

Enclosures

copy: Ted Stone, The Corradino Group



## STATE OF MICHIGAN

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## DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

K.L. COOL, Director

REPLY TO:  
NATURAL HERITAGE  
P.O. BOX 30180  
LANSING MI 48909

October 31, 2000

Mr. Ted Stone  
The Corradino Group  
200 South Fifth Street, Suite 300 North  
Louisville, KY 40202

Dear Mr. Stone:

The location of the proposed project (M-15 Improvement Project) was checked against known localities for special natural features recorded in the Michigan Natural Features Inventory (MNFI) database, which is part of the DNR, Wildlife Division, Natural Heritage Program.

The MNFI database is an ongoing, continuously updated information base, which is the only comprehensive single source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the MNFI database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date, and may require verification. In most cases, the only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey. *The applicant's responsibility to preserve protected species is not limited to the species listed below. Other species may be present that have not been recorded in the database.*

The presence of threatened or endangered species does not necessarily preclude development but may require alterations in a development plan. If a threatened or endangered species has the potential to be "taken" or "harmed" by a proposed development or activity, an Endangered Species Permit will be required from the Department of Natural Resources, Wildlife Division, under Part 365, Endangered Species Protection, of the Natural Resources and Environmental Protection Act, Act 451. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered.

The following is a summary of the results of the MNFI review of the project in:  
Oakland, Genesee Counties.

The following list includes special features that are known to occur on or near the site(s) and may be impacted by the project. Federally listed threatened or endangered species are marked with an asterisk (\*). Please contact the U.S. Fish and Wildlife Service, 2651 Coolidge Road, East Lansing, 48823 (517-351-2555) for information on federal regulations that apply to these species.

common name	status	scientific name
Eastern massasauga	special concern	<i>Sistrurus catenatus catenatus</i>

The Eastern massasauga rattlesnake has been known to occur in the area, specifically section 17, T4N R9E and section 15, T6N R8E. This species has recently become a candidate for federal protection. Massasauga are usually associated with damp lowlands, including river bottom woodlands, shrub swamps, bogs and fens, marsh borders, sedge meadows, and moist prairie. In early summer many



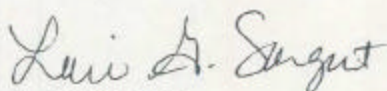
Massasaugas move into adjacent well-drained uplands to spend the warmer months foraging in shrubby fields and grasslands, including pastures and hay fields. These snakes usually overwinter singly in crayfish or mammal burrows, often close to the groundwater level, and emerge in April as water levels rise. They spend much time in spring basking on higher ground, such as sedge and grass clumps, muskrat and beaver lodges, or the edges of dikes and other embankments.

We recommend that if a massasauga rattlesnake is observed that it be left alone and allowed time to retreat. The snake should not be handled or harassed. This rattlesnake is generally shy and unaggressive and offers little danger to reasonably cautious people willing to leave them alone. They are mild-mannered, seldom rattling until thoroughly aroused.

The project site appears to include suitable habitat for the above listed species. Potential impacts of the project that would likely negatively affect this/these species include alteration of wetland hydrology, removal of forest canopy, direct destruction of species, disturbance of critical habitat.

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. If you have further questions, please call me at 517-373-1263.

Sincerely,



Lori G. Sargent  
Endangered Species Specialist  
Wildlife Division

LGS:jao



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

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RUSSELL J. HARDING, Director

REPLY TO:

SHIAWASSEE DISTRICT OFFICE  
10650 BENNETT DR  
MORRICE MI 48857-9792

November 29, 2000

Mr. Ted Stone  
The Corradino Group  
First Trust Centre, Suite 300 North  
200 S. Fifth Street  
Louisville, KY 40202

Dear Mr. Stone:

SUBJECT: Environmental Assessment of M-15 Improvements

Thank you for the opportunity to comment on the scoping document for the M-15 improvement project. Although there are a number of issues to be considered when making the final decision regarding which alternative is the best option, the focus of the scoping document seemed to be safety and traffic flow concerns. There was little discussion regarding the potential environmental impacts of each option.

Based on the information provided, we are unable to determine the potential impacts to the surrounding wetlands and surface waters for the options discussed. There are some concerns that should be considered regardless of the option chosen, such as potential impacts of soil erosion and sedimentation during the construction phase; flow volumes both during and post construction; and pollutant (oil and grease, salt, etc.) impacts of the discharge once construction is completed.

We welcome the opportunity to review and comment on a proposed project once an alternative has been selected. At that time, we would be better able to make suggestions regarding potential surface water impacts and measures that should be considered to minimize, or mitigate such impacts.

Please feel free to contact myself at the number below or Mr. Martin Hendges at 734-953-1470 if we can be of further assistance.

Sincerely,

Cheryl Lynn Bartley  
Environmental Quality Analyst  
Surface Water Quality Division  
517-625-4675

clb:dg





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

NOV 29 2000

REPLY TO THE ATTENTION OF

B-19J

Norman R. Stoner, Assistant Division Administrator  
Federal Highway Administration, Michigan Division  
Federal Building, Room 207  
315 West Allegan Street  
Lansing, MI 48933-1528

Dear Mr. Stoner:

The U.S. Environmental Protection Agency (U.S. EPA) has received scoping information, dated October 2, 2000, for the Environmental Assessment (EA) supporting the development of Route M-15, between Routes I-69 and I-75 in Oakland and Genesee Counties, Michigan. In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we are responding with comments.

According to the scoping information, there is a need to develop Route M-15, based on the following issues: (1) land use and development, (2) accidents, and (3) transportation demand and capacity. The alternatives listed to remedy the need are: (1) a no build, (2) mass transit, (3) transportation system management, (4) new alignments, and (5) reconstruction.

U.S. EPA recommends that the EA for this project be developed with consideration for the following points:

1. The purpose and need section should include a "purpose and need statement," a clear and concise statement which summarizes the purpose and need of the project. The purpose and need section should provide enough background information to support the range of alternatives selected for evaluation.
2. A detailed discussion of the selected alternatives should be included in the EA. Each alternative should be adequately analyzed in order to show how the preferred alternative is the best choice for satisfying the stated purpose and need for action.
3. The EA should have a section which describes the affected environment. This section should include a description of the characteristics of the immediate and surrounding environment, including wetlands (e.g., the prairie fens in Oakland County), farmland, water quality, air quality, endangered species, land use, and cultural resources.
4. The "environmental consequences" portion of the EA should describe possible wetland